

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Terri Leanne MAXWELL

Case No. 2:20-mj-30162

Judge: Unassigned,

Filed: 04-23-2020 At 10:15 AM

CMP USA v. Terri Leanne Maxwell (krc)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 22, 2020 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 USC 952

Importation of Controlled Substances

21 USC 841(a)(1)

Possession of a Controlled Substance with Intent to Distribute (Marijuana)

21 USC 846

Conspiracy to Distribute a Controlled Substance (Marijuana)

This criminal complaint is based on these facts:

See attached AFFIDAVIT.

☒ Continued on the attached sheet.*Complainant's signature*

Joshua Maxwell, CBP Enforcement Officer

*Printed name and title*Sworn to before me and signed in my  
presence.*Judge's signature*Date: 04/23/2020

Hon. Patricia T. Morris, United States Magistrate Judge

*Printed name and title*City and state: Dearborn, Michigan Bay City, Michigan

## **AFFIDAVIT**

I, Joshua R. Maxwell, Enforcement Officer with the United States Department of Homeland Security, U.S. Customs and Border Protection, being duly sworn, depose and state the following:

### **I. INTRODUCTION**

1. I am an Enforcement Officer with the United States Department of Homeland Security, U.S. Customs and Border Protection, and have been employed with the same for twenty years. During my career as a law enforcement officer, I have been involved in various investigations and arrests of individuals suspected of or convicted of violations enforced by U.S. Customs and Border Protection, to include the interception and seizing of various narcotics. I have received training in this area at the U.S. Customs Academy and the Advanced Enforcement Officer Academy.

2. This affidavit is based on personal knowledge from my participation in this investigation, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all facts known to law enforcement related to this investigation.

4. U.S. Customs and Border Protection is currently conducting an investigation of Terri Leanne MAXWELL (DOB: 09/XX/1971) for violations of 21 U.S.C. § 952 (Importation of a Controlled Substance (Marijuana)), 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute a Controlled Substance (Marijuana)), and 21 U.S.C. § 846 (Conspiracy to Distribute a Controlled Substance (Marijuana)).

## **II. PROBABLE CAUSE**

5. On April 22, 2020, at approximately 9:07 a.m., at the Detroit Ambassador Bridge, Detroit, Michigan, in the Eastern District of Michigan, Terri Leanne MAXWELL applied for admission into the United States from Canada in a Ford Fusion with Ontario license plate CLAV 8XX. MAXWELL was the sole vehicle occupant and registered owner.

6. MAXWELL presented a Canadian passport, HB195XXX, and I-94, 5702466XX XX, showing she has valid status to work as a Registered Nurse, under Trade NAFTA, to Customs and Border Protection Officer (CBPO) D. Pierce. MAXWELL had a placard on her front dash issued by Canada Border Services Agency (CBSA) showing that she is a first responder, a health care worker, to facilitate her travel across the international border. Currently, only essential travel between Canada and the United States is authorized during the COVID-19 Pandemic.

7. MAXWELL was wearing scrubs, a lab coat, and a work badge for Henry Ford Hospital.

8. CBPO D. Pierce had MAXWELL open her trunk for an enforcement exam. CBPO F. Wisdom noticed that MAXWELL's trunk was full and that there was an odor of marijuana emanating from the trunk. CBPO D. Pierce also noticed the odor and had CBPO F. Wisdom open the bags in the trunk. Upon opening the bags, CBPO D. Pierce and CBPO F. Wisdom noticed what appeared to be numerous vacuum sealed bags of suspected marijuana. MAXWELL was removed from the vehicle and escorted to CBP secondary.

9. In CBP secondary, MAXWELL's fingerprints were queried through CBP systems, with a match to Fingerprint Identification Number (FIN), 105824XXXX. Queries of FIN 105824XXXX revealed that MAXWELL was issued a zero tolerance penalty from U.S. Customs and Border Protection on May 7, 2007, for being in possession of 5.80 grams of marijuana.

10. CBPO G. Johnson tested one of the bags of suspected marijuana utilizing narcotics test kit 908 Duquenois-Levine Reagent, with positive results. CBPO G. Johnson removed a total of 143 bags of suspected marijuana from MAXWELL's trunk, with a total weight of approximately 153.69 pounds.

11. Based on my training and experience, I know that 153.69 pounds is a distribution amount of marijuana.

### III. CONCLUSION

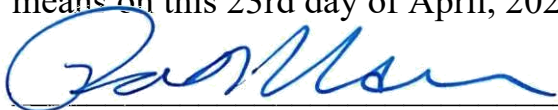
12. Based upon the aforementioned facts, there is probable cause to believe that on April 22, 2020, in the Eastern District of Michigan, Terry Leanne MAXWELL, an alien who applied for admission to the United States at the border crossing between Canada and the United States, intentionally and knowingly imported a controlled substance (marijuana) into the United States, in violation 21 U.S.C. § 952, knowingly possessed marijuana with the intent to distribute it, in violation of 21 U.S.C. § 841(a)(1), and conspired to distribute marijuana, in violation of 21 U.S.C. § 846.



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Joshua R. Maxwell, Enforcement Officer  
U.S. Customs and Border Protection

Subscribed and sworn before me and signed  
in my presence and/or by reliable electronic  
means on this 23rd day of April, 2020.



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Patricia T. Morris  
United States Magistrate Judge